



Iowa Department of Human Services

Terry E. Branstad
Governor

Kim Reynolds
Lt. Governor

Charles M. Palmer
Director

INFORMATIONAL LETTER NO.1205

DATE: January 11, 2013

TO: All Iowa Medicaid Providers

ISSUED BY: Iowa Department of Human Services, Iowa Medicaid Enterprise (IME)

RE: Clarification of Disclosure Requirements for Enrollment Renewal

EFFECTIVE: Immediately

On May 15, 2012, the IME announced the Enrollment Renewal requirement for all participating Medicaid providers in Informational Letter [1128](#) (and subsequent reminders). Providers must complete enrollment renewal immediately.

Enrollment Renewal includes components where providers must disclose certain information consistent with strengthened federal program integrity regulations. This has raised some provider questions around the definition of the terms “payment suspension” and “sanction imposed” (by, a federal or state health care program), and how far back a provider organization must look to disclose.

The IME expects the fullest disclosure possible, consistent with the expression of the regulation. Providers are to disclose any and all situations where Medicaid payments were withheld, reduced or not provided. The IME understands that in many instances, situations are later resolved in favor of the provider and no further payer action was (or will be) taken. When in doubt, report; interpret the terms of disclosure as broadly as possible. Disclosure is meant to be a means for the IME to comply with the federal program integrity efforts of preventing fraud, waste and abuse. Regarding the length of time a provider should “look back” to report such issues, there is no expressed time limitation on this disclosure in the regulation. Again, the IME expects the fullest disclosure possible. If there are instances where a provider maintains a limited history of their records (for example, seven years) and therefore does not have knowledge of any actions beyond that period, providing an explanation of such is appropriate.

While the IME understands renewal may be an involved process, it is only required once every five years and is necessary to properly describe our provider network and meet program requirements. We appreciate your assistance and attention in this endeavor.

The IME appreciates your continued partnership as we work to improve the claim processing service quality and accuracy. If you have any questions, please contact the IME Provider Services Unit at 1-800-338-7909, locally in Des Moines at 515-256-4609 or via email at: imeproviderservices@dhs.state.ia.us.